



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

Dr. Andrzej Komorowski
Chief Veterinary Officer
Veterinary Inspection
General Veterinary Inspectorate
Republic of Poland
30 Wspolna Street
00-930 Warsaw, Poland

APR 25 2001

Dear Dr. Komorowski:

The Food Safety and Inspection Service conducted an on-site audit of Poland's meat inspection system from May 22 through June 8, 2000. Enclosed is a copy of the final audit report. Poland's comments on the draft final audit report have been included as an attachment to the enclosed final audit report.

If you have any questions regarding the audit or need additional information, please contact me by telephone at (202) 720-3781. You may also contact me by fax at (202) 690-4040 or by e-mail at sally.stratmoen@usda.gov.

Sincerely,

Sally Stratmoen, Chief
Equivalence Section, International Policy Staff
Office of Policy, Program Development
and Evaluation

Enclosure



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Agriculture

Food Safety
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AUDIT REPORT FOR POLAND MAY 22 THROUGH JUNE 8, 2000

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Poland's meat inspection system from May 22 through June 8, 2000. Seven of the eighteen establishments certified to export meat to the United States were audited. Six of these were combined slaughter/processing establishments; the remaining one was conducting processing operations.

The last audit of the Poland's meat inspection system was conducted in May/June 1999. Eight establishments were audited: six were acceptable (33, 58, 67, 73, 201 and 268), one was evaluated as acceptable/re-review (65), and one was unacceptable (267). Five major deficiencies were reported at that time: Establishment 267, did not have adequate controls in place to prevent, detect, control and correct product contamination/adulteration of meat and meat product. This deficiency was not observed during this audit. The daily pre-operational and operational sanitation was deficient in Establishments 58, 65, 73 201 and 268. None of these establishments were included in the new itinerary. A species verification testing program was not implemented in Establishments 33, 58, 65, 67, 201, 267 and 268. Poland has asked for exception from testing for species and was presently not performing species verification. Poland's meat inspection officials were not adequately verifying the establishments' HACCP plan for monitoring critical control points, corrective actions, recordkeeping systems and verification procedures. Most of these deficiencies had been corrected by Polish inspection service.

Beef and pork products are eligible for export to the U.S.

During the period from January 1 to April 30, 2000 Poland establishments exported nearly 4,813,673 million pounds of pork product to the U.S. Port-of-entry rejections for transportation damage and container condition and for violative net weight were 21357 pounds. Currently, Poland is under APHIS restriction for BSE.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Poland national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat inspection headquarters facilities preceding the on-site visits. Three establishments that regularly export to the United States and three establishments that do not regularly export to the U.S. were selected for records review. The third was conducted by on-site visits to seven establishments. Six establishments were selected randomly, while one establishment delisted during the previous audit was added to the list of establishments scheduled for on-site audit. The fourth was a visit to two laboratories, one performing analytical testing of field samples for the national residue testing program, and the other culturing field samples for the presence of microbiological contamination with *Salmonella*. Poland doesn't use private laboratories for microbiological testing.

Program effectiveness determinations focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species. Poland's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials (this was not the case with any establishment).

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in all seven establishments audited; one of these (Est. 30180603) was recommended for re-review. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

HACCP-implementation deficiencies had been found in all eight establishments visited during the previous audit. During this new audit, implementation deficiencies were found in the HACCP programs of three (Ests. 33, 45 and 268) of the seven establishments visited. Details are provided in the Slaughter/ Processing Controls section in this report. One was a repeated deficiency.

Entrance Meeting

On May 24, an entrance meeting was held at the General Veterinary Inspectorate offices of the *Poland National Veterinary Services*, and was attended by; Dr. Robert Gmyrek, Deputy Chief Veterinary Officer, General Veterinary Inspectorate; Dr. Adam Jarecki, Head of Division for European Integration and Foreign Co-operation Division, General Veterinary Inspectorate; Mr. Stanley Phillips, Agricultural Attaché, United States Embassy Warsaw; Mr. Piotr Rucinski, Agricultural Specialist, U.S. Embassy Warsaw; Dr. Ghias Mughal, Branch Chief, International Audit Staff; and Dr. Oto Urban, Auditor, International Audit Staff, USDA/FSIS. Topics of discussion included the following:

1. Structure and function of Poland National Veterinary Services.
2. Structure and function of residue and microbiology laboratories.
3. Changes in the audit's itinerary.
4. Disease status according to APHIS.
5. Control of *Listeria monocytogenes*.

A short meeting was also held with Mr. Stanley Phillips, Agricultural Attaché; Mr. Piotr Rucinski, Agricultural Specialist, Dr. Ghias Mughal, Branch Chief, International Audit Staff and Dr. Oto Urban, Auditor, International Audit Staff at the U.S. Embassy in Warsaw.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Poland's inspection system in May/June 1999, except that Dr. Robert Gmyrek was appointed to the position of Deputy Chief Veterinary Officer.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the headquarters. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels, and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.

- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

The following concerns arose as a result the examination of these documents:

1. Ests. 46 and 101 did not have written HACCP verification programs.
2. Est. 67 did not address in its written HACCP program verification for control of biological, chemical, and physical hazards, and a verification program for CCPs was missing. Additionally, microbiological standard violations were recorded twice in the SSOP but no corrective action was indicated.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Poland as eligible to export meat products to the United States were full-time General Veterinary Inspectorate employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

Eighteen establishments were certified to export meat products to the United States at the time this audit was conducted. Seven establishments were visited for on-site audits. In six of the seven establishments visited, both National Veterinary Service (NVS) inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products. In Est. 30180603, which was evaluated as acceptable/re-review, problems were found with pre-operational sanitation and pest controls, and corrective actions were not adequate, but no direct product contamination was observed.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information about the following risk areas was also collected:

1. Government oversight of accredited and approved laboratories. There are no private laboratories in Poland.
2. Intra-laboratory quality assurance procedures, including sample handling.

3. Methodology.

The Veterinary Drug Residues Laboratory in Pulawy was audited on May 31, 2000. Field Residue/Microbiology Laboratory (Zaklad Higieny Weterynaryjnej) in Poznan was audited on June 6, 2000. Except as noted below, effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable.

Expiration dates were missing on some standards in the residue laboratory in Pulawy.

This laboratory also performs bacteriological analysis but only for non-HACCP/PR *Salmonella* and *E. coli* samples.

Poland's microbiological testing for *Salmonella* was being performed in government laboratories. One of these, the Zaklad Higieny Weterynaryjnej (ZHW) in Poznan was audited. The pages of some laboratory books in the laboratory at Poznan were not numbered. The intralaboratory check samples given to the analyst did not meet U.S. requirement. The supervisor was not sure of the check sample concentration.

Establishment Operations by Establishment Number

The following operations were being conducted in the seven establishments:

Beef and pork slaughter, boning, cured (dried) smoked products, cooked sausages and canning - three establishments (66, 267 and 131)

Beef and pork slaughter, boning, cured (dried) smoked products and cooked sausages – four establishments (45, 33, 268 and 30180603)

SANITATION CONTROLS

Based on the on-site audits of establishments, Poland's inspection system had controls in place for: water potability records, chlorination procedures, back-siphonage prevention, hand washing facilities, separation of establishments, pest control program, temperature control, lighting, inspector work space, ventilation, facilities approval, equipment approval, product contact equipment, other product area, dry storage areas, welfare facilities, outside premises, personal dress and habits, personal hygiene practices, sanitary dressing procedures, product handling and storage, product reconditioning, product transportation, effective maintenance program, operational sanitation and waste disposal.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with only occasional minor variations. The following deficiencies were found with regard to the SSOP requirements:

1. There was inadequate identification of pre-operational procedures in their written SSOPs, distinguishing them from sanitation activities to be carried out during operations in Ests. 66 and 268. The establishment management will correct this deficiency.
2. The written description of corrective actions taken in response to findings in the boning room were inadequate in Ests. 33 and 66. This deficiency will be corrected in both establishments.

Vermin Controls Procedures

1. Rodent control bait station (box) was observed to be empty in Establishment 45. The contracted company is going to be informed about this deficiency.
2. Mosquitoes, flies and spider web were present in the processing area and spice room in Establishment 30180603. No immediate corrective action was taken by the establishment or inspection officials.

Operational Sanitation

At the carcass decontamination unit station, carcasses were being contaminated by coming in contact with the vacuum hose that was touching the floor in Establishment 131. The corrective action was taken immediately.

Over-product ceilings and equipment

1. Flaking paint was observed in areas of cooler and hallway in Establishments 66 and 131. This deficiency was scheduled for corrective action.
2. Condensation was observed directly over a product flow area in Establishment 131 and the chiller in Establishment 30180603. Corrective action was taken in Establishment 131 by the establishment management but not in Establishment 30180603 either by establishment or Inspection Service.
3. Non-dripping condensation was observed over carcasses at the sanitary slaughter in Establishment 268. The corrective action was taken immediately by the establishment officials.
4. Frozen condensation was observed in the freezer of Establishment 268. This deficiency was programmed for correction by the establishment officials.
5. Dripping water from pipes over a product flow area on the kill floor was observed in Establishment 45. This deficiency was corrected immediately.
6. Rusty equipment (hooks, pipes) were observed in Establishments 66 and 267. This deficiency was programmed for correction by the establishment officials.

Ante-mortem Facilities

The same drinking water container was used for both suspect animals and animals that had passed the ante-mortem inspection in Est. 267. The corrective action was scheduled by the Polish Inspection Service for a later date.

Sanitizers

Water temperature observed was below required 180°F level in Establishment 33. Thermometers were not functional in Establishments 268 and 45. These deficiencies were corrected immediately in all establishments.

Cross-Contamination

Offals were contaminated during dressing procedure by contacting the floor in Establishment 267. This was corrected immediately by the establishment management.

Preoperational Sanitation

1. Meat tenderizer, ready for use, had not been cleaned in Establishment 267. This deficiency was corrected immediately by establishment officials.
2. Edible product containers were not properly washed on the preoperational sanitation in Establishment 30180603. No corrective action was taken by either establishment or inspection officials.

Equipment Sanitizing

1. Viscera pans were not being properly rinsed between use in Establishment 33. This was corrected immediately by the establishment management.
2. Edible product trays were not properly washed in Establishment 30180603. No corrective action was taken by either the establishment or Inspection Service.

ANIMAL DISEASE CONTROLS

With the exceptions listed below, Poland's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

Carcasses on the suspect line were not properly segregated and some of them were contacting each other in Est 267. This was corrected immediately by the inspection service.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

Poland has a system in place through which slaughter animals could be reliably traced back to the farms of origin.

Currently, BSE has not been reported in Poland, but the country was under APHIS restriction for this disease. Poland is free of Classical Swine Fever. However, Swine Vesicular Disease is still present in Poland.

RESIDUE CONTROLS

Poland's National Residue Testing Plan for 2000 was being followed, and was on schedule. Poland inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

Poland inspection system had controls in place to ensure adequate requirements for humane slaughter, post-mortem disposition, condemned product control, restricted product control, returned and reworked product, pre-boning trim, ingredients identification, control of restricted ingredients, formulations, packaging materials, laboratory confirmation, label approvals, special label claims, inspector monitoring, processing schedules, processing equipment, processing records, empty can inspection, filling procedures, container closure exam, interim container handling, post-processing handling, incubation procedures, processing defect actions by the establishment, and inspection processing control.

It was not clear from the observation and discussion, who was performing boneless meat reinspection and when and when it was being done.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements. However, the following deficiencies were observed with HACCP implementation:

1. In general, the corrective action was addressed but the preventive action was missing.
2. CCP verification was missing in Establishments 33 and 45.
3. Written HACCP did not have zero tolerance for fecal contamination in Establishment 268.

4. Reassessment of HACCP was not identified by signature and date in Establishment 33.

Testing for Generic *E. coli*

Poland has adopted the FSIS regulatory requirements for *E. coli* testing. Six of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements.

Polish establishments have been using government laboratories for *E. coli* testing. The criteria used for equivalence decisions for use of government laboratories in lieu of private laboratories are:

- The laboratory has properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
- Results of analyses, including all permanently recorded data and summaries, are reported promptly to the establishment.

Additionally, establishments had adequate controls in place to prevent meat products intended for Poland domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

Except as noted below, the Poland inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other countries for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Six of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Poland has adopted the FSIS regulatory requirements for *Salmonella* testing. The *Salmonella* testing programs were found to meet the basic FSIS regulatory requirements.

Species Verification

Poland has requested exemption from testing for species and was not performing species verification at the present time.

Monthly Reviews

These reviews were being performed by the Polish equivalent of Circuit Supervisors. All were veterinarians with several years of experience. The internal review program was applied equally to both export and non-export establishments. Internal review visits were announced in advance, and were conducted, at times by individuals and at other times by a team of reviewers, at least once monthly. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the National Veterinary Service offices in Warsaw, and were routinely maintained on file for a minimum of 3 years.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, there must be an in-depth review by the regional inspection service. The results are reported to headquarters in Warsaw, where a determination about the establishment's reinstatement is made by the higher-level officials.

Enforcement Activities

General Veterinary Inspectorate takes legal action against meat hygiene violators, issues fines, and removes establishments in violation from the list of exporting establishments to the U.S. Administrative and criminal enforcement of laws and regulation regarding meat inspection are initiated by the Ministry of Agriculture and carried out by the Justice Ministry.

Exit Meetings

An exit meeting was conducted in Warsaw on June 8. The Poland participants were: Dr. Andrzej Komorowski, Chief Veterinary Officer; Dr. Robert Gmyrek, Deputy Chief Veterinary Officer; Dr. Jan Z. Szyborski, Head of the Veterinary Public Health Division;

22 Regional and Area Directors; Mr. Jim Higgiston, Agricultural Counselor; Mr. Stanley Phillips, Agricultural Attaché; Mr. Piotr Rucinski, Agricultural Specialist, American Embassy in Warsaw; Dr. Ghias Mughal, Branch Chief, International Review Staff; and Dr. Oto Urban, Auditor, International Review Staff, USDA/FSIS. The following topics were discussed:

1. Contamination of offals from dressing operation in Establishment 267. This deficiency was corrected immediately by the establishment employees.
2. Condensation in different areas and different stages in Establishments 268, 131, 45 and 30180603. Except in Establishment 30180603, this deficiency was corrected immediately by the establishment employees.
3. There was a common source of water for suspect and non-suspect animals in the ante-mortem pen in Establishment 267. This deficiency was promised to be corrected by the Inspection Service of Poland as soon as possible.
4. Presence of insect (flies and spiders) in Establishment 30180603 was noted. No corrective action was taken either by establishment or Inspection Service.
5. Carcasses were not properly segregated on the suspect line in Establishment 33. Improvement was promised by the Polish Inspection Service.
6. Verification of CCP was not performed in Establishments 33 and 45. There was no CCP for prevention and monitoring of fecal contamination in Establishment 268. Change of the HACCP procedure by daily verification of CCP was promised by establishment officials.
7. Polish officials requested permission to export product containing chicken meat from Establishment 30180603. It was explained to government officials and establishment management that Poland has not been approved for export of poultry to the U.S.

Regarding the deficiencies that were corrected and not corrected in establishments (contamination of offals in Est. 267, condensation in Ests. 268, 131, 45 and 30180603, the common source of water for suspect and non-suspect animals in Est. 267, presence of insects in Est. 30180603, segregation of carcasses on the suspect line in Est. 33, verification of not performed in Ests. 33 and 45, and no CCP for fecal contamination in Est. 268), headquarters officials gave assurances that inspection personnel would monitor these areas more closely.

CONCLUSION

The inspection system of Poland was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Seven establishments were audited: six were acceptable, and one was evaluated as acceptable/re-review, in part due to lack of immediate corrective action. The deficiencies encountered during the on-site establishment audits, in those establishments which were found to be acceptable, were adequately addressed to the auditor's satisfaction.

Dr. Oto Urban
International Audit Staff Officer

(Signed) Dr. Oto Urban

ATTACHMENTS

- A. Data collection instrument for SSOPs
- B. Data collection instrument for HACCP programs
- C. Data collection instrument for *E. coli* testing.
- D. Data collection instrument for *Salmonella* testing
- E. Laboratory audit form
- F. Individual Foreign Establishment Audit Forms
- G. Written Foreign Country's Response to the Draft Final Audit Report

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1. Written program addressed	2. Pre-op sanitation addressed	3. Oper. Sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible indiv. Identified	7. Documentation done daily	8. Dated and signed
66	√	√	√	√	√	√	No	No
267	√	√	√	√	√	√	√	√
45	√	√	√	√	√	√	√	√
33	√	√	√	√	√	√	No	√
131	√	√	√	√	√	√		√
268	√	No	√	√	√	√	√	√
30180603	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

101	√	No	√	√	√	√	√	√
46*								
67**	√	√	√	√	√	√	No	

*SSOP was not received from establishment

**Microbiological standard violation was recorded twice but corrective action was not taken

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment had conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
8. The plan describes corrective actions taken when a critical limit is exceeded.
9. The HACCP plan was validated using multiple monitoring results.
10. *The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.*
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. actions are described	9. Plan validated	10. Adequate verification procedures	11. Adequate documentation	12. Dated and signed
66	√	√	√	√	√							
267	√	√	√	√	√	√	√	√	√	√		√
45	√	√	√	√	√	√	√	√	√	No	√	√
33	√	√	√	√	√	√	√	√	√	No	√	No
131	√	√	√	√	√	√		√	√	√	√	
268	√	√	√	√	√	√	√	√	√	No	√	√
30180603	√	√	√	√	√	√	√	√	√	√	√	√

45. Verification procedure was missing.

33. Verification procedure was missing.

Reassessment procedure was not identified by signature and date.

268. CCP for zero tolerance for fecal contamination not clearly understood.

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

101	√	√	√	√	√	√	√	√	√	No	√	√
46	√	√	√	√	√	√		√	√	No	√	√
67						No				No		

- 101. No HACCP verification process detected.
- 46. No HACCP verification process detected.
- 67. HACCP verification process missing.
 - Biological, chemical and physical hazard designation was missing.

Data Collection Instrument for Generic *E. coli* Testing

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli*.
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1. Writ- ten pro- cedure	2. Samp- ler des- ignated	3. Samp- ling lo- cation given	4. Pre- domin. species sampled	5. Samp- ling at the req'd freq.	6. Pro- per site or method	7. Samp- ling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
66	√	√	√	√	√	√	√	√	√	√
267	√	√	√	√	√	√	√	√	√	√
45	√	√	√	√	√	√	√	√	√	√
33	√	√	√	√	√	√	√	√	√	√
131	√	√	√	√	√	√	√	√	√	√
268	√	√	√	√	√	√	√	√		√
30180603	√	√	√	√	√	√		√		√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

101	√	√	√	√	√	√		√		√
46	√	√	√	√	√	√	√	√	√	√
67										

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. *Salmonella* testing is being done in this establishment.
2. Carcasses are being sampled.
3. Ground product is being sampled.
4. The samples are being taken randomly.
5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.
6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	1. Testing as required	2. Carcasses are sampled	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
66	√	√		√	√	√
267	√	√	No	√	√	√
45	√	√	No	√	√	√
33	√	√	No	√	√	√
131	√	√	No	√	√	√
268	√	√	No	√	√	√
30180603	√	√	N/A		√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

101	√	√	√	√	√	√
46	√	√	√	√	√	√
67						

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

REVIEW DATE

NAME OF FOREIGN LABORATORY

5-31-2000

National Veterinary Research
Institute (NVR)

FOREIGN COUNTRY LABORATORY REVIEW

Department of Pharmacology and Toxicology

FOREIGN GOV'T AGENCY

CITY & COUNTRY

Department of Hygiene & Food of Animal Origin

Pulawy, POLAND

ADDRESS OF LABORATORY

24-100 Pulawy
Al. Partyzantow 57

NAME OF REVIEWER

NAME OF FOREIGN OFFICIAL

Dr. O Urban

Dr. Emilian Kudyba

Residue Code/Name			100	111	300	200	203	400	500	800	923	Salmonella	E. coli	Listeria monocytogenes
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #												
	Sample Handling	01	A	A	A	A	A	A	A	A	A	A	A	A
	Sampling Frequency	02	A	A	A	A	A	A	A	A	A	A	A	A
	Timely Analyses	03	A	A	A	A	A	A	A	A	A	A	A	A
	Compositing Procedure	04	O	O	O	O	O	O	O	O	O	O	O	O
	Interpret Comp Data	05	O	O	O	O	O	O	O	O	O	O	O	O
	Data Reporting	06	A	A	A	A	A	A	A	A	A	A	A	A
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A	A	A	A	O	O	A*
	Correct Tissue(s)	08	A	A	A	A	A	A	A	A	A	A	A	A
	Equipment Operation	09	A	A	A	A	A	A	A	A	A	A	A	O
	Instrument Printouts	10	A	A	A	O	A	A	A	A	A	O	O	O
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	A	A	A	A	A	O	O	O
	Recovery Frequency	12	A	A	A	A	A	A	A	A	A	O	O	O
	Percent Recovery	13	A	A	A	A	A	A	A	A	A	O	O	O
	Check Sample Frequency	14	A	A	A	A	A	A	A	A	A	A	A	A
	All analyst w/Check Samples	15	A	A	A	A	A	A	A	A	A	A	A	A
	Corrective Actions	16	A	A	A	A	A	A	A	A	A	A	A	A
	International Check Samples	17	O	O	A	O	O	A	O	A	A	O	O	A
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	O	O	O	O	O	O	A	O	O	O	O	O
OTHER REVIEW		19												
		20												

* Salmonella & E. coli testing has been performed for non HACCP/PR samples only.

Expiration dates of some standards were missing

INTERNATIONAL PROGRAMS, FSIS, USDA
FOREIGN COUNTRY LABORATORY REVIEW

Review Date

6-6-2000

Name of Foreign Laboratory

ZHW POZNAN

Foreign Gov't Agency

EMILIAN KUDYBA

City & Country

Poznan & Poland

Address of laboratory

UL. GRUNWALDZKA 250
61-166 POZNAN

Name of Reviewer

Dr. Oto Urban

Name of Foreign Official

PROF DR HAB
WALENTY KEMPSKI

Evaluation Codes

(see reverse side)

A; U; O; M; N; E; C

SAMPLING PROCEDURES

Review Items	Item #	E. coli	Salmonella	Listeria										
Residue Code or Name														
Sample Handling	01	✓	✓	✓										
Sampling Frequency	02	✓	✓	✓										
Timely Analyses	03	✓	✓	✓										
Compositing Procedure	04	0	0	0										
Interpret Comp Data	05	0	0	0										
Data Reporting	06	✓	✓	✓										

ANALYTICAL PROCEDURES

Review Items	Item #	E. coli	Salmonella	Listeria										
Residue Code or Name														
Acceptable Method	07	✓	✓	✓										
Correct Tissue(s)	08	✓	✓	✓										
Equipment Operation	09	0	0	0										
Instrument Printouts	10	0	0	0										

QUALITY ASSURANCE PROCEDURES

Review Items	Item #	E. coli	Salmonella	Listeria										
Residue Code or Name														
Minimum Detection Levels	11	0	0	0										
Recovery Frequency	12	0	0	0										
Percent Recovery	13	0	0	0										
Check Sample Frequency	14	A	A	A										
All analyst w/Check Samples	15	C	C	C										
Corrective Actions	16	C	C	C										
International Check Samples	17	0	0	0										

REVIEW PROCEDURES

Review Items	Item #	E. coli	Salmonella	Listeria										
Residue Code or Name														
Corrected Prior Deficiencies	18	0	0	0										

OTHER REVIEW FINDINGS

Review Items	Item #													
Residue Code or Name														
	19													

Signature of reviewer _____

Codes used for each review item: A=acceptable; U=unacceptable; O=does not apply; M=marginally acceptable; N=not reviewed; E=exempt; C=comments on reverse side.
 30-Pyrethrins; 100-Chlorinated Hydrocarbon Pesticides; 111-Polychlorinated Biphenyls; 300-Organophosphorous Pesticides; 200-Antibiotics; 203-Chloramphenicol; 400-Trace Elements; 500-Hormone(DES); 600-Nitrogen Pesticides (Aldicarb); 700-Herbicides (2,4-D); 710-Triazines; 800-Sulfonamides; 902-Furazolidone; 903-Nitrofurazone; 906-Ipronidazole; 907-Carbadox; 910-Levamisole; 923-Ivermectin; 950-Benzimidazoles; S-Species; L-Listeria

ITEM #	RESIDUE CODE	COMMENTARY (ATTACH ADDITIONAL PAGES AND DOCUMENTS AS NECESSARY)
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* No swabs analysis performed for E.coli & Salmonella

15 & 16

Salmonella
 E.coli
 Listeria

} Two analysts have been tested at the same time but the intralaboratory check samples were not known to the supervisor

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE 6/7/00	ESTABLISHMENT NO. AND NAME 30180603 Wielkopolska Wytownia Zywnosci Profi SP. Z Q.Q.		CITY Grabow N/Prosna
FOREIGN PLANT REVIEW FORM				COUNTRY Poland	
NAME OF REVIEWER Dr. Oto Urban		NAME OF FOREIGN OFFICIAL Drs. Grazyna Tomaszewska & Emilian Kudyba		EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention		28 A	Formulations
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 U	Packaging materials
Water potability records	01 A	Product handling and storage		30 A	Laboratory confirmation
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals
Back siphonage prevention	03 A	Product transportation		32 O	Special label claims
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring
Sanitizers	05 A	Effective maintenance program		33 A	Processing schedules
Establishments separation	06 A	Preoperational sanitation		34 A	Processing equipment
Pest --no evidence	07 M	Operational sanitation		35 A	Processing records
Pest control program	08 A	Waste disposal		36 A	Empty can inspection
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures
Temperature control	10 A	Animal identification		37 O	Container closure exam
Lighting	11 A	Antemortem inspec. procedures		38 O	Interim container handling
Operations work space	12 A	Antemortem dispositions		39 O	Post-processing handling
Inspector work space	13 A	Humane Slaughter		40 O	Incubation procedures
Ventilation	14 A	Postmortem inspec. procedures		41 O	Process. defect actions -- plant
Facilities approval	15 A	Postmortem dispositions		42 O	Processing control -- inspection
Equipment approval	16 O	Condemned product control		43 A	5. COMPLIANCE/ECON. FRAUD CONTROL
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 A	Export product identification
Over-product ceilings	17 M	Returned and rework product		45 A	Inspector verification
Over-product equipment	18 A	3. RESIDUE CONTROL			Export certificates
Product contact equipment	19 A	Residue program compliance		46 O	Single standard
Other product areas (inside)	20 A	Sampling procedures		47 O	Inspection supervision
Dry storage areas	21 A	Residue reporting procedures		48 O	Control of security items
Antemortem facilities	22 O	Approval of chemicals, etc.		49 A	Shipment security
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 A	Imports
Personal dress and habits	25 A	Boneless meat reinspection		52 A	
Personal hygiene practices	26 A	Ingredients identification		53 A	
Sanitary dressing procedures	27 O	Control of restricted ingredients		54 A	

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 6/7/00	ESTABLISHMENT NO. AND NAME 30180603 Wielkopolska Wytownia Zywnosci Profi SP. Z Q.Q.	CITY Grabow N/Prosna
	COUNTRY Poland		
NAME OF REVIEWER Dr. Oto Urban	NAME OF FOREIGN OFFICIAL Drs. Grazyna Tomaszewska & Emilian Kudyba	EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

7 There was evidence of a problem with mosquitoes, flies and spiders in several areas of the establishment. No immediate corrective action was taken by the establishment.

17 Non-dripping condensation was observed in the chiller. No corrective action was performed by the establishment.

29 Edible product trays were improperly washed. No corrective action was taken by the establishment.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY
FOREIGN PLANT REVIEW FORM		6/5/00	268 Sokolow S.A. Oddzial Sokolowskie Zaklady Miesne		Sokolow Podlaski
NAME OF REVIEWER Dr. Oto Urban		NAME OF FOREIGN OFFICIAL Drs. Stanislaw Bujak & Emilian Kudyba		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below)					
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention		28 A	Formulations 55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 A	Packaging materials 56 A
Water potability records	01 A	Product handling and storage		30 A	Laboratory confirmation 57 A
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals 58 A
Back siphonage prevention	03 A	Product transportation		32 O	Special label claims 59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring 60 O
Sanitizers	05 M	Effective maintenance program		33 A	Processing schedules 61 O
Establishments separation	06 A	Preoperational sanitation		34 A	Processing equipment 62 O
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records 63 O
Pest control program	08 A	Waste disposal		36 A	Empty can inspection 64 O
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures 65 O
Temperature control	10 A	Animal identification		37 A	Container closure exam 66 O
Lighting	11 A	Antemortem inspec. procedures		38 A	Interim container handling 67 O
Operations work space	12 A	Antemortem dispositions		39 A	Post-processing handling 68 O
Inspector work space	13 A	Humane Slaughter		40 A	Incubation procedures 69 O
Ventilation	14 A	Postmortem inspec. procedures		41 A	Process. defect actions -- plant 70 O
Facilities approval	15 A	Postmortem dispositions		42 A	Processing control -- inspection 71 O
Equipment approval	16 O	Condemned product control		43 A	5. COMPLIANCE/ECON. FRAUD CONTROL
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 A	Export product identification 72 A
Over-product ceilings	17 M	Returned and rework product		45 A	Inspector verification 73 A
Over-product equipment	18 A	3. RESIDUE CONTROL			Export certificates 74 O
Product contact equipment	19 A	Residue program compliance		46 A	Single standard 75 A
Other product areas (inside)	20 A	Sampling procedures		47 A	Inspection supervision 76 A
Dry storage areas	21 A	Residue reporting procedures		48 A	Control of security items 77 A
Antemortem facilities	22 A	Approval of chemicals, etc.		49 A	Shipment security 78 A
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification 79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status 80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 A	Imports 81 O
Personal dress and habits	25 A	Boneless meat reinspection		52 A	
Personal hygiene practices	26 A	Ingredients identification		53 A	
Sanitary dressing procedures	27 A	Control of restricted ingredients		54 A	

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 6/5/00	ESTABLISHMENT NO. AND NAME 268 Sokolow S.A. Oddzial Sokolowskie Zaklady Miesne	CITY Sokolow Podlaski
			COUNTRY Poland
NAME OF REVIEWER Dr. Oto Urban	NAME OF FOREIGN OFFICIAL Drs. Stanislaw Bujak & Emilian Kudyba		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

5 Water temperature of a sanitizer was observed bellow the required level due to a thermometer failure, in the slaughter house. This deficiency was corrected immediately.

17 Non-dripping condensation was observed over carcasses in the sanitary slaughter. Corrected immediately by the establishment management.

17 Frozen condensation was observed in the freezer.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY
FOREIGN PLANT REVIEW FORM		6/2/00	131 Zakłady Miesne Morliny S.A.		Ostroda
					COUNTRY
NAME OF REVIEWER Dr. Oto Urban		NAME OF FOREIGN OFFICIAL Drs. Zbigniew Kalski & Emilian Kudyba		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below)					
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention		28 M	Formulations
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 A	Packaging materials
Water potability records	01 A	Product handling and storage		30 A	Laboratory confirmation
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals
Back siphonage prevention	03 A	Product transportation		32 O	Special label claims
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring
Sanitizers	05 A	Effective maintenance program		33 A	Processing schedules
Establishments separation	06 A	Preoperational sanitation		34 A	Processing equipment
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records
Pest control program	08 A	Waste disposal		36 A	Empty can inspection
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures
Temperature control	10 A	Animal identification		37 A	Container closure exam
Lighting	11 A	Antemortem inspec. procedures		38 A	Interim container handling
Operations work space	12 A	Antemortem dispositions		39 A	Post-processing handling
Inspector work space	13 A	Humane Slaughter		40 A	Incubation procedures
Ventilation	14 A	Postmortem inspec. procedures		41 A	Process. defect actions -- plant
Facilities approval	15 A	Postmortem dispositions		42 A	Processing control -- inspection
Equipment approval	16 O	Condemned product control		43 A	5. COMPLIANCE/ECON. FRAUD CONTROL
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 A	Export product identification
Over-product ceilings	17 M	Returned and rework product		45 A	Inspector verification
Over-product equipment	18 A	3. RESIDUE CONTROL			Export certificates
Product contact equipment	19 A	Residue program compliance		46 A	Single standard
Other product areas (inside)	20 A	Sampling procedures		47 A	Inspection supervision
Dry storage areas	21 A	Residue reporting procedures		48 A	Control of security items
Antemortem facilities	22 A	Approval of chemicals, etc.		49 A	Shipment security
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 A	Imports
Personal dress and habits	25 A	Boneless meat reinspection		52 A	
Personal hygiene practices	26 A	Ingredients identification		53 A	
Sanitary dressing procedures	27 A	Control of restricted ingredients		54 A	

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 6/2/00	ESTABLISHMENT NO. AND NAME 131 Zaklady Miesne Morliny S.A.	CITY Ostroda
			COUNTRY Poland
NAME OF REVIEWER Dr. Oto Urban	NAME OF FOREIGN OFFICIAL Drs. Zbigniew Kalski & Emilian Kudyba		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

17 Flaking paint was observed in area of hallway. Corrected immediately by the establishment management.

17 Non-dripping condensation was observed not over carcasses in the sanitary slaughter. Corrective action was performed immediately.

28 Carcasses were contaminated by a vacuum pipe, which was used as a carcass decontamination unit.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE 6/1/00	ESTABLISHMENT NO. AND NAME 33 Constar S.A.		CITY Starachowice
FOREIGN PLANT REVIEW FORM				COUNTRY Poland	
NAME OF REVIEWER Dr. Oto Urban		NAME OF FOREIGN OFFICIAL Drs. Elzbieta Michalewicz & Emilian Kudyba		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

CODES (Give an appropriate code for each review item listed below)

A = Acceptable
 M = Marginally Acceptable
 U = Unacceptable
 N = Not Reviewed
 O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 M	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 O	Special label claims	59 A
Hand washing facilities	04 M	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 O
Sanitizers	05 M	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 M	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 O	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 6/1/00	ESTABLISHMENT NO. AND NAME 33 Constar S.A.	CITY Starachowice
			COUNTRY Poland
NAME OF REVIEWER Dr. Oto Urban	NAME OF FOREIGN OFFICIAL Drs. Elzbieta Michalewicz & Emilian Kudyba		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

4 Waste receptacle was missing at the hand washing in the stunning room.

5 The water temperature in the sanitizer was bellow the required level (82 C). This deficiency was corrected immediate by the management.

29 Viscera pens were improperly washed. Corrected by the establishment management.

40 Several animals were stunned with insufficient power. This deficiency was corrected by the establishment management.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE 5/30/00	ESTABLISHMENT NO. AND NAME 45 Farm Food S.A. Oddzial Czyzew	CITY Czyzew	
FOREIGN PLANT REVIEW FORM				COUNTRY Poland	
NAME OF REVIEWER Dr. Oto Urban		NAME OF FOREIGN OFFICIAL Drs. Jozef Gromadzki & Emilian Kudyba		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations 55 A	
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials 56 A	
Water potability records	01 A	Product handling and storage	30 M	Laboratory confirmation 57 A	
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals 58 A*	
Back siphonage prevention	03 A	Product transportation	32 O	Special label claims 59 A*	
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring 60 O	
Sanitizers	05 M	Effective maintenance program	33 A	Processing schedules 61 O	
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment 62 O	
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records 63 O	
Pest control program	08 A	Waste disposal	36 A	Empty can inspection 64 O	
Pest control monitoring	09 M	2. DISEASE CONTROL		Filling procedures 65 O	
Temperature control	10 A	Animal identification	37 A	Container closure exam 66 O	
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling 67 O	
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling 68 O	
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures 69 O	
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant 70 O	
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection 71 O	
Equipment approval	16 O	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification 72 A	
Over-product ceilings	17 M	Returned and rework product	45 A	Inspector verification 73 A	
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates 74 O	
Product contact equipment	19 A	Residue program compliance	46 A	Single standard 75 A	
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision 76 A	
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items 77 A	
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security 78 A	
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification 79 A	
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status 80 A	
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports 81 O	
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	5/30/00	45 Farm Food S.A. Oddzial Czyzew	Czyzew
			COUNTRY
			Poland
NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL		EVALUATION
Dr. Oto Urban	Drs. Jozef Gromadzki & Emilian Kudyba		<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

5 Water temperature of a sanitizer was observed to be bellow required level due to termometer that was out of order in the kill floor. This deficiency was corrected immediately by the establishment management.

9 Rodent control bait station (box) was observed to be empty.

17 Dripping water from pipes was observed on the kill floor. Corrected immediately by the establishment management.

30 Damaged boxes with cut packages were observed in the freezer.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS FOREIGN PLANT REVIEW FORM		REVIEW DATE 5/29/00	ESTABLISHMENT NO. AND NAME 267 Rawske Zakłady Miesne "Rawa" S.A.		CITY Rawa Mazowiecka COUNTRY Poland
NAME OF REVIEWER Dr. Oto Urban		NAME OF FOREIGN OFFICIAL Drs. Tadeusz Kuligowski & Emilian Kudyba		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention		28 M	Formulations
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 M	Packaging materials
Water potability records	01 A	Product handling and storage		30 A	Laboratory confirmation
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals
Back siphonage prevention	03 A	Product transportation		32 O	Special label claims
Hand washing facilities	04 M	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring
Sanitizers	05 A	Effective maintenance program		33 A	Processing schedules
Establishments separation	06 A	Preoperational sanitation		34 M	Processing equipment
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records
Pest control program	08 A	Waste disposal		36 A	Empty can inspection
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures
Temperature control	10 A	Animal identification		37 A	Container closure exam
Lighting	11 A	Antemortem inspec. procedures		38 A	Interim container handling
Operations work space	12 A	Antemortem dispositions		39 A	Post-processing handling
Inspector work space	13 A	Humane Slaughter		40 A	Incubation procedures
Ventilation	14 A	Postmortem inspec. procedures		41 A	Process. defect actions -- plant
Facilities approval	15 A	Postmortem dispositions		42 A	Processing control -- inspection
Equipment approval	16 O	Condemned product control		43 A	5. COMPLIANCE/ECON. FRAUD CONTROL
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 A	Export product identification
Over-product ceilings	17 A	Returned and rework product		45 A	Inspector verification
Over-product equipment	18 A	3. RESIDUE CONTROL			Export certificates
Product contact equipment	19 M	Residue program compliance		46 A	Single standard
Other product areas (inside)	20 A	Sampling procedures		47 A	Inspection supervision
Dry storage areas	21 A	Residue reporting procedures		48 A	Control of security items
Antemortem facilities	22 M	Approval of chemicals, etc.		49 A	Shipment security
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 A	Imports
Personal dress and habits	25 A	Boneless meat reinspection		52 A	
Personal hygiene practices	26 A	Ingredients identification		53 A	
Sanitary dressing procedures	27 A	Control of restricted ingredients		54 A	

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 5/29/00	ESTABLISHMENT NO. AND NAME 267 Rawske Zaklady Miesne "Rawa" S.A.	CITY Rawa Mazowiecka
	COUNTRY Poland		
NAME OF REVIEWER Dr. Oto Urban	NAME OF FOREIGN OFFICIAL Drs. Tadeusz Kuligowski & Emilian Kudyba		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

- 4 Trash basket's lid was found to be hand operated. This deficiency was immediately corrected by the establishment officials.
- 19 Rusty hooks were observed in the entrance area of intestine wash.
- 22 Ante-mortem suspect pen had the same place for drinking water, used by both; suspect and healthy animals.
- 28 Carcasses on the suspect line were not properly segregated on line and some of them were contacting each other. Corrected by the establishment officials.
- 28 Offals were contaminated from dressing procedure by contacting the floor. Corrected immediately by the establishment management.
- 29 Knife, used for edible product purposes was not sanitized by an employee after removing contamination in the boning room.
- 34 Meat tenderizer was found dirty before use in the processing room. This deficiency was corrected immediately.
- 58 The establishment was not able to locate the U.S. approval for the 18 lb ham can.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY
FOREIGN PLANT REVIEW FORM		5/26/00	66 Zaklady Miesne Lmeat Lukow S.A.		Lukow
					COUNTRY Poland
NAME OF REVIEWER Dr. Oto Urban		NAME OF FOREIGN OFFICIAL Drs. Leszek Mioduski & Emilian Kudyba		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention		28 A	Formulations A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 A	Packaging materials A
Water potability records	01 A	Product handling and storage		30 A	Laboratory confirmation A
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals A
Back siphonage prevention	03 A	Product transportation		32 N	Special label claims O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring A
Sanitizers	05 A	Effective maintenance program		33 A	Processing schedules A
Establishments separation	06 A	Preoperational sanitation		34 A	Processing equipment A
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records A
Pest control program	08 A+	Waste disposal		36 A	Empty can inspection A
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures A
Temperature control	10 A	Animal identification		37 A	Container closure exam A
Lighting	11 A	Antemortem inspec. procedures		38 A	Interim container handling A
Operations work space	12 A	Antemortem dispositions		39 A	Post-processing handling A
Inspector work space	13 A	Humane Slaughter		40 A	Incubation procedures A
Ventilation	14 A	Postmortem inspec. procedures		41 A	Process. defect actions -- plant A
Facilities approval	15 A	Postmortem dispositions		42 A	Processing control -- inspection A
Equipment approval	16 O	Condemned product control		43 A	5. COMPLIANCE/ECON. FRAUD CONTROL
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 A	Export product identification A
Over-product ceilings	17 M	Returned and rework product		45 A	Inspector verification A
Over-product equipment	18 A	3. RESIDUE CONTROL			Export certificates A
Product contact equipment	19 M	Residue program compliance		46 A	Single standard A
Other product areas (inside)	20 A	Sampling procedures		47 A	Inspection supervision A
Dry storage areas	21 A	Residue reporting procedures		48 A	Control of security items A
Antemortem facilities	22 A	Approval of chemicals, etc.		49 A	Shipment security A
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 A	Imports O
Personal dress and habits	25 A	Boneless meat reinspection		52 A	
Personal hygiene practices	26 A	Ingredients identification		53 A	
Sanitary dressing procedures	27 A	Control of restricted ingredients		54 A	

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE 5/26/00	ESTABLISHMENT NO. AND NAME 66 Zakłady Miesne Lmeat Lukow S.A.	CITY Lukow
	COUNTRY Poland		
NAME OF REVIEWER Dr. Oto Urban	NAME OF FOREIGN OFFICIAL Drs. Leszek Mioduski & Emilian Kudyba		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

8* Rodent control program recordkeeping needs improvement (the establishment checking has not been recorded, only the contracting company).

17 Flaking paint was observed in area of cooler. It was corrected immediately by the establishment management.

19 Rusty equipment (hooks, pipes) were observed in the sanitary slaughter room.

FAX TRANSMISSION COVER SHEET

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Office of Agricultural Affairs
Al. Ujazdowskie 29/31
00-540 Warsaw, Poland**

Phone: (48-22) 621-39-26 or (48-22) 628-3041 **Ext:** 2460
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From: Maggie Dowling, Agricultural Attache

Date: 1/10/2001

This FAX contains 5 pages

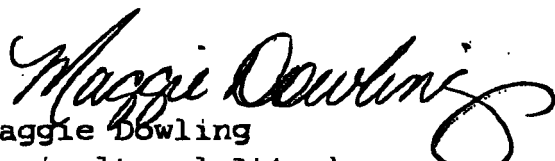
To: Mark Manis, Director
International Policy Division,
Office of Policy,
Program Development and Evaluation,
FSIS/USDA

Fax: (202) 720-7990

Subject: Comments to the May/June 2000 Audit of Meat Plants

Attached is the letter that our office received on January 10, 2001 regarding the audit carried out in Poland in May and June of 2000. The letter contains comments to the audit requested by FSIS in the letter of November 29, 2000. I am also mailing you the letter.

Regards,


Maggie Dowling
Agricultural Attache



**VETERINARY INSPECTION
GENERAL VETERINARY INSPECTORATE
CHIEF VETERINARY OFFICER**

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E mail: wet@minrol.gov.pl

GIWhig.US/501/12a/2000

Warsaw 9 January 2001

**Mr. Mark Manis
Director
International Policy Division
Office of Policy, Program Development
and Evaluation Enclosure
Washington D.C.
20250**

Dear Sir.

First of all I would like to thank you for your experts' visit from May 22 through June 8, 2000 and their professional remarks. They were very helpful indeed.

Please, find the enclosed information how the found deficiencies, described in Audit Report for Poland dated on 15 November 2000, have been removed in our establishments.

I. 66 Zakłady Mięsne Lmeat Łuków:

1. According to point 1 of 'Sanitation Standards Operating Procedures' chapter, there is full identification of pre – operational and operational sanitation procedures and activities to be carried out and it is fully documented by two separate documents.
2. According to point 2 of 'Sanitation Standards Operating Procedures' chapter, there are corrective actions described and carried out in proper way in boning room during operations.
3. According to point 8 of 'Foreign Plant Review Form' there had been improvement of rodent control program: increasing of frequency of

controls of rodent baits for every two weeks by contracted company – appointed employee.

4. According to point 17 of 'Foreign Plant Review Form' there had been done repairs so there is no longer any flaking paint observed in cooler area.
 5. According to point 19 of 'Foreign Plant Review Form' after repairs there is no longer rusty equipment in the sanitary slaughter room.
- All corrections were done right after FSIS/USDA expert visit.

II. 33 Constar S.A.

1. According to point 2 of 'Sanitation Standards Operating Procedures' chapter, there are corrective actions described and carried out in proper way in boning room during operations.
2. According to point 4 of 'Foreign Plant Review Form' on missing waste receptacle in the stunning room, deficiency was corrected immediately what was confirmed by veterinary inspection.
3. According to point 5 of 'Foreign Plant Review Form' on too low sanitizer temperature, deficiency was corrected immediately what was confirmed by veterinary inspection.
4. According to point 29 of 'Foreign Plant Review Form' on improperly washed viscera pens, deficiency was corrected immediately what was confirmed by veterinary inspection.
5. According to point 40 of 'Foreign Plant Review Form' on stunning with insufficient power, deficiency was corrected immediately what was confirmed by veterinary inspection.
6. According to point 2 of 'HACCP Implementation' chapter on missing CCP verification, deficiency was corrected immediately.
7. According to point 4 of 'HACCP Implementation' chapter on missing date and signature on reassessment of HACCP, deficiency was corrected immediately.
8. According to point 2 of 'Exit meetings' chapter on carcasses not properly segregated on the suspect line, deficiency was corrected immediately.

There was meeting, of official veterinarians and establishment management to check if regarding to all USDA/FSIS audit findings proper corrective actions were taken, conducted on 27 December 2000

III. 131 Zakłady Mięsne Morliny S.A.

In accordance to: points 17 and 28 of 'Foreign Plant Review Form', points 1 and 2 of 'Over – product ceilings and equipment' chapter, 'Operational Sanitation' chapter, all deficiencies were corrected immediately on 2 June 2000.

On July and August Veterinary Inspection conducted visits on site in establishment and showed no deficiencies like observed during USDA/FSIS audit.

IV. 268 Sokółów S.A. Oddział Sokolowskie Zakłady Mięsne

1. According to points 5 and 17 of 'Foreign Plant Review Form' on technical deficiencies like wrong temperature of water in sanitizer, non dripping condensation, frozen condensation, thermometer failure were corrected and now are in line with all requirements.
2. According to SSOPs deficiencies there were identified methods of control of equipment and facilities in departments with continuous operation.
3. According to point 2 of 'HACCP Implementation' chapter on zero tolerance for fecal contamination, establishment has implemented in their HACCP plan zero tolerance for that kind of contamination.

V. 30180603 Wielkopolska Wytwórnia Żywności Profi Sp. z o.o.

According to all deficiencies observed during the audit and described in audit report following corrective actions had been undertaken:

1. Review of procedures of pests control
2. New UV lamps were added
3. Check of an air filters
4. New air curtain was added
5. Everyday checks in frames of SSOPs of protection against pests is performed and registered regularly
6. The way of use of chilling room had been changed to prevent from frozen condensation
7. Procedures of washing trays for edible products were improved (better light - 540lx, control point was established right after washing, monitoring of procedure of washing was placed in SSOPs procedures, there was staff training performed in that matter)

Establishment had been audited before operations started so it is not fair to say that no actions were taken to correct deficiencies because all actions were done right after operations started.

VI. 45 Farm Food S.A. Oddział Czyżew

1. According to point 5 of 'Foreign Plant Review Form' on water temperature in sanitizer, thermometer was replaced with good one and temperature in sanitizer was increased to required level.
2. According to point 9 of 'Foreign Plant Review Form' on rodent control bait station, review of bait station was done and number of control checks

of those baits was increased to level 2 times a month – April, May and September, October, November.

3. According to point 17 of 'Foreign Plant Review Form' on dripping water from pipes, to avoid such situation effectiveness of ventilation was improved.
4. According to point 30 of 'Foreign Plant Review Form' on damaged box with cut packages, the box was removed and product was repacked.

Regarding remarks on verification of CCP, establishment has increased frequency of control in CCP: according to heat treatment once a day, the rest of CCP 2 times a week.

VII. 267 Rawskie Zakłady Mięsne 'Rawa' S.A.

Establishment was cancelled from the list of establishment eligible for export to USA.

Referring to establishments which were not visited on site: 101 Zakłady Mięsne 'Jarosław' S.A., 46 Zakłady Mięsne 'Dolina Łąk', 67 'Sokołów' S.A. Oddział Zakłady Mięsne w Kole S.A., all deficiencies regarding documentation were corrected in satisfactory way.

If you will have any further questions please do not hesitate to contact me.

With kindest regards,
Sincerely yours.

CHIEF VETERINARY OFFICER


Andrzej Kombrowski